

August 18, 2005

Mr. Roy Crossland START Project Officer U.S. Environmental Protection Agency, Region 7 901 North 5th Street Kansas City, Kansas 66101

Subject:

Emergency Response Report

Praxair, Inc., Fire Response, St. Louis, Missouri

U.S. EPA Region 7 START 2, Contract No. 68-S7-01-41, Task Order No. 0001.02.R1.04

Task Monitor: Jim Silver, On-Scene Coordinator

Dear Mr. Crossland:

Tetra Tech EM Inc. is submitting the attached Emergency Response Report for the Praxair, Inc., Fire Response site in St. Louis, Missouri. If you have any questions or comments, please contact the project manager at (314) 892-6322, extension 23.

Sincerely,

Joe Parish

START Project Manager

Hieu Q. Vu, PE, CHMM START Program Manager

Enclosure

40474225 Superfund 54

04-00

G9011/0001.02.R1.04

EMERGENCY RESPONSE REPORT PRAXAIR, INC., FIRE RESPONSE SITE - ST. LOUIS, MISSOURI

Superfund Technical Assessment and Response Team (START)

Contract No. 68-S7-01-41, Task Order No. 0001.02.R1.04

Prepared For:

U.S. Environmental Protection Agency Region 7 901 North 5th Street Kansas City, Kansas 66101

August 18, 2005

Prepared By:

Tetra Tech EM Inc. 8030 Flint Street Lenexa, Kansas 66214 (913) 894-2600

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1.0 INCIDENT

On June 24, 2005, the Tetra Tech EM Inc. (Tetra Tech) Superfund Technical Assessment and Response Team (START) was tasked by the U.S. Environmental Protection Agency (EPA) Region 7 Superfund Division to respond to a three-alarm fire at the Praxair Distribution, Inc. (Praxair), facility in St. Louis, Missouri. Praxair, a division of Praxair, Inc., is a large supplier of atmospheric, process, and specialty gases, and high-performance coatings. The fire had started at approximately 1500 hours that day. The cause of the fire was unknown, but reportedly started in an area where cylinders of compressed gases were stored, including acetylene, propane, and propylene. Toxic gases such as chlorine, ammonia, and possibly cyanide were also stored at the facility, but they reportedly were not involved in the fire. The St. Louis Fire Department's Hazmat team conducted real-time air monitoring for chlorine gas at the site, and no release was indicated. Some compressed cylinders had burst and scattered flaming debris, igniting nearby parked automobiles, wooden fences, and yards. The force of the explosions had also broken windows in nearby homes, and some of the scattered debris damaged walls and fences at surrounding properties. Nearby residents were requested to evacuate their homes until the fire was brought under control, although some chose to stay.

START had been initially placed on standby response status by EPA, but was later dispatched to the site at 1700 hours on June 24, 2005. Tetra Tech START member (STM) Joe Parish responded to the incident, along with EPA Region 7 On-Scene Coordinator (OSC) Jim Silver.

2.0 RESPONSE ACTIVITIES

START arrived at the site at 1820 hours and met with the EPA OSC and personnel from the Missouri Department of Natural Resources (MDNR). The Praxair facility is located in a mixed residential/industrial area at 2210 Chouteau Avenue—just north of Lafayette Park in the City of St. Louis, Missouri (see Appendix A, Figures 1 and 2). The geographic coordinates of the site are 90° 12' 56.38" west longitude and 38° 37' 15.58" north latitude. Also on site were the St. Louis Fire Department, the St. Louis Police Department, representatives form the Metropolitan Sewer District (MSD), and Praxair personnel and their response contractor, Phillips Environmental Services. When START arrived at the site, the fire was under control, but acetylene cylinders continued to burn (see Appendix B). START was tasked to conduct air monitoring for flammable and toxic gases in perimeter residential areas and in the nearby sewer system,

which had received runoff from fire suppression efforts. START used a Thermo Environmental 580EZ photoionization detector (PID), a Biosystems PhD Lite four-gas monitor, and Biosystems Toxi Ultra chlorine and hydrogen cyanide single-gas detectors to conduct the monitoring. Perimeter readings indicated no release of toxic gases, except for slightly elevated levels of carbon monoxide near smoke plumes. A summary of START's real-time air monitoring readings is included in Table 1.

TABLE 1

AIR MONITORING SUMMARY
PRAXAIR INC. FIRE RESPONSE SITE – ST. LOUIS, MISSOURI
JUNE 24, 2005

Location	Time (hours)	VOCs (ppm)	O ₂ (%)	LEL (%)	CO (ppm)	H ₂ S (ppm)	CL ₂ (ppm)	HCN (ppm)
Jefferson & Chouteau (combination sewer)	1916	ND	20.9	0	ND	ND	ND	ND
Jefferson & Chouteau (ambient air)	2017	ND	20.9	0	ND	ND	ND	ND
Missouri & Chouteau (storm sewer)	2021	ND	20.9	0	ND	ND	ND	ND
Missouri & Chouteau (ambient air)	2022	ND	20.9	0	ND	ND	ND	ND
LaSalle & Missouri (ambient air)	2027	ND	20.7	0	4	ND	NR	NR
South of Praxair Facility (ambient air)	2036	ND	20.9	0	4	ND	ND	ND
Mackay & Hickory (ambient air)	2048	ND	20.9	0	ND	ND	ND	ND

Notes:

% Percent Cl₂ Chlorine

CO Carbon monoxide H₂S Hydrogen sulfide HCN Hydrogen cyanide

LEL Lower explosive limit ND Not detected

NR No reading
Oxygen

O₂ Oxygen ppm Parts per million

VOC Volatile organic compound

Also on June 24, 2005, an airplane mounted with infrared monitoring equipment (for EPA's Airborne Spectral Photographic Environmental Collection Technology [ASPECT] project) was dispatched from its base in Texas to aerially monitor the airborne emissions from the site. The ASPECT plane arrived at the site at 1945 hours and detected no release of concern. Upon completion of air monitoring activities, START departed the site at 2119 hours.

3.0 FOLLOWUP ACTIVITIES

Following the fire, it was learned that some of the acetylene tanks had been lined with asbestos-containing material that was released to the environment during the incident. Praxair contractors sampled for airborne asbestos during the week following the fire, and MDNR conducted similar sampling on June 30, 2005. In these samples, the highest reported asbestos concentration was 0.0057 fibers per cubic centimeter (cm³), below the Threshold Limit Value (TLV) of 0.1 fibers per cm³ established by the American Conference of Governmental Industrial Hygienists. Asbestos-containing debris from the site was found on surrounding streets, rooftops, parking lots, and yards. Up to 25% chrysotile asbestos was detected in samples of the debris collected by MDNR; consequently, Praxair had to address asbestos abatement activities, as well as other environmental and public health issues, as per MDNR's Hazardous Substance Emergency Declaration #050624-1530, dated July 1, 2005 (see Appendix C). Asbestos removal and remediation were subsequently conducted by The Shaw Group Inc. and Bellon Environmental Company, under contract to Praxair.

4.0 SUMMARY AND CONCLUSIONS

On June 24, 2005, Tetra Tech START was tasked by EPA to respond to a three-alarm fire at the Praxair, Inc, facility in St. Louis, Missouri. Praxair is a large supplier of atmospheric, process, and specialty gases, and high-performance coatings. The fire reportedly started at 1500 hours on June 24, 2005, in an area where acetylene, propane, and propylene gases were stored. The cause of the fire was unknown. Toxic gases such as chlorine, ammonia, and possibly cyanide were also stored at the facility, but were reportedly not involved in the fire.

START conducted air monitoring for flammable and toxic gases in perimeter residential areas and in combination storm-sanitary sewers. The perimeter air monitoring indicated no release of toxic gases at levels of concern. In addition, the ASPECT plane was dispatched from its base in Texas to aerially monitor airborne emissions at the site. No concentrations of concern were detected.

Following the fire, it was learned that some of the acetylene tanks were lined with asbestos-containing material, which was released to the environment during the incident. Praxair contractors and MDNR conducted air sampling for asbestos following the fire and found the asbestos concentrations below levels of concern. However, asbestos was detected in samples of debris originating from the site littering nearby streets, rooftops, and yards. Consequently, qualified companies contracted by Praxair conducted followup abatement and cleanup.

4.1 REMOVAL CONSIDERATIONS

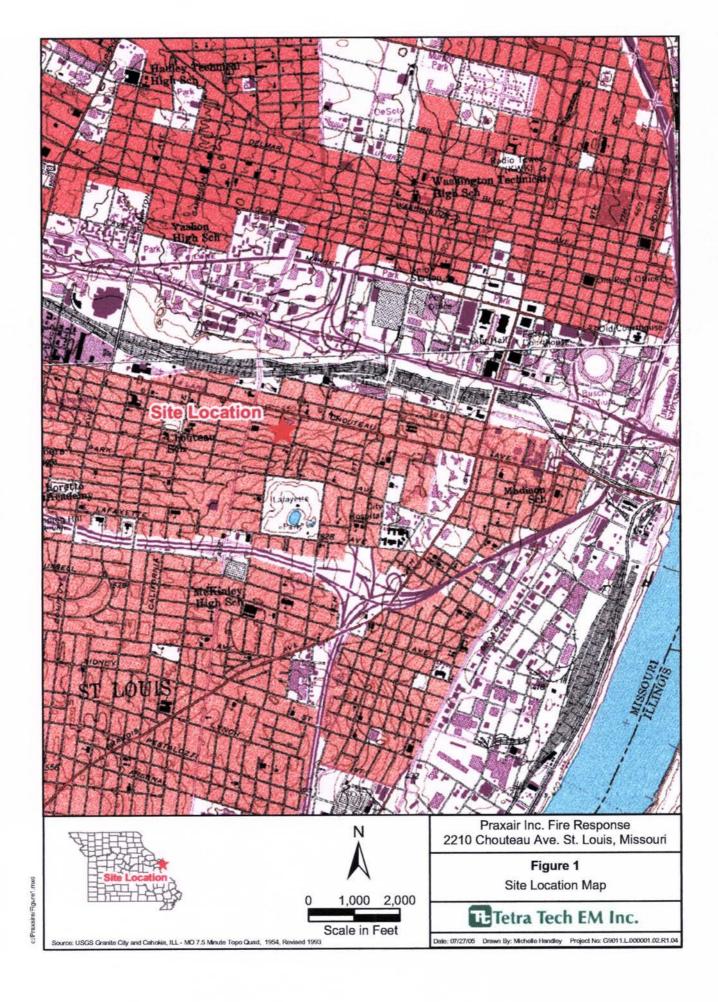
Based on visual observations and sampling data, a release of asbestos-containing materials to the environment (nearby residential and industrial properties) was documented. MDNR subsequently issued a Hazardous Substance Emergency Declaration, directing the potentially responsible party (PRP), Praxair Distribution Inc., to address environmental and health problems associated with the fire. Consequently, Praxair initiated cleanup activities in response to this directive. No further Superfund response appears warranted at this time.

4.2 PRE-REMEDIAL CONSIDERATIONS

All significant threats to human health and the environment relating to the incident are believed to have been addressed by the aforementioned cleanup activities. As a result, no pre-remedial activities appear warranted at the site. A Pre-Comprehensive Environmental Response, Compensation, and Liability Information System (Pre-CERCLIS) Screening Form is included as Appendix D.

APPENDIX A FIGURES

(Two Pages)









Praxair Inc. Fire Response 2210 Chouteau Ave., St. Louis, Missouri

> Figure 2 Site Layout



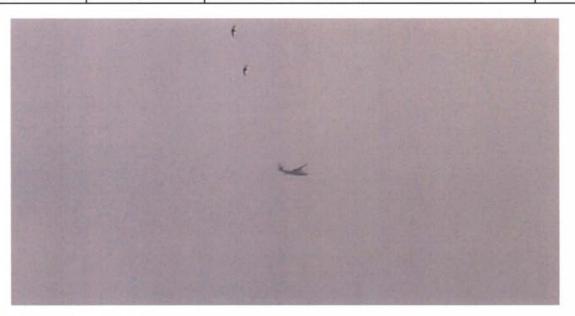
Date: 07/27/05 Drawn By: Michelle Handley Project No: G9011.L.000001.02.R1.04

APPENDIX B PHOTOGRAPHIC DOCUMENTATION

(Five Pages)



TETRA TECH	DESCRIPTION	This photograph shows the smoke plume viewed from the Incident Command Post.	1
PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Southeast	PHOTOGRAPHER	Joe Parish	6/24/05



	DESCRIPTION	This photograph shows the ASPECT plane flying over the site.	2
TETRA TECH PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: South	PHOTOGRAPHER	Joe Parish	6/24/05



TETRA TECH	DESCRIPTION	This photograph shows fire-fighting efforts along Missouri Avenue, near the facility's west lot.	3
PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Southeast	PHOTOGRAPHER	Joe Parish	6/24/05



TETRA TECH	DESCRIPTION	This photograph shows acetylene cylinders burning at the facility's south lot.	4
PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Northwest	PHOTOGRAPHER	Joe Parish	6/24/05



	DESCRIPTION	This photograph shows acetylene cylinders burning at the site.	5
TETRA TECH PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Northwest	PHOTOGRAPHER	Joe Parish	6/24/05



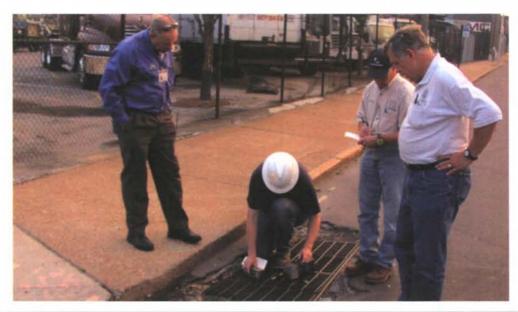
TETRA TECH	DESCRIPTION	This photograph of the south lot shows the facility's proximity to neighboring residences.	6
PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Northeast	PHOTOGRAPHER	Joe Parish	6/24/05



	DESCRIPTION	This photograph shows a burned automobile near the south lot.	7
TETRA TECH PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Southeast	PHOTOGRAPHER	MDNR/ John Whitaker	6/24/05



	DESCRIPTION	This photograph shows a damaged abandoned building.	8
TETRA TECH PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Northeast	PHOTOGRAPHER	MDNR/ John Whitaker	6/24/05



TETRA TECH PROJECT NO. G9011.E00.0001.02.R1.04	DESCRIPTION	This photograph shows START performing air monitoring in a sewer grate near Missouri and Chouteau Avenues.	9
	CLIENT	Environmental Protection Agency Region 7	Date
Dir: Northwest	PHOTOGRAPHER	MDNR/ John Whitaker	6/24/05



TETRA TECH	DESCRIPTION	This photograph shows an acetylene cylinder and asbestos- containing debris in a street near the site.	10
PROJECT NO. G9011.E00.0001.02.R1.04	CLIENT	Environmental Protection Agency Region 7	Date
Dir: NA	PHOTOGRAPHER	MDNR/ John Whitaker	6/24/05

APPENDIX C HAZARDOUS SUBSTANCE EMERGENCY DECLARATION #050624-1530-KAH

(Three Pages)

Matt Blunt, Governor . Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

July 1, 2005

CERTIFIED MAIL: 7099 3220 0009 3711 8928 RETURN RECEIPT REQUESTED

Mr. Wayne Yakich Praxair Distribution, Inc. 39 Old Ridgebury Road Danbury, CT 06810

RE: Hazardous Substance Emergency Declaration, Praxair Facility Fire,

St. Louis, Missouri, EER Incident #050624-1530-KAH

Dear Mr. Yakich:

The Missouri Department of Natural Resources (department) is issuing this written Hazardous Substance Emergency Declaration to you, under authority of Chapter 260.500 – 260.550 RSMo, based upon the department's on-site investigation of public safety, health, and the environment related to the above referenced incident.

On June 24, 2005, the department's Environmental Emergency Response Section (EER) was notified of a fire at the Praxair Distribution, Inc. facility involving various gas cylinders. The department immediately dispatched two On-Scene Coordinators (OSC) to the site to assist the local officials. As you are aware, the incident resulted in breached acetylene gas cylinders that contain asbestos material. Investigation of the incident and Praxair Distribution Inc. sampling conducted at the site confirmed that asbestos material was released during the incident. The department's independent samples collected on Thursday, June 30, 2005, indicated the continued presence of friable asbestos in materials/debris located off-site of the facility.

The department is requiring that you take the following actions to abate this environmental emergency:

- Provide an inventory of product and waste materials involved in the incident, estimated quantities released, and Materials Safety Data Sheets for all materials involved.
- Continue an off-site assessment to determine the location of asbestos containing material, debris, and any other hazardous materials released during the incident. A status update of the assessment and the plan to complete this task must be provided to the department for approval by no later than 1700 hours, July 6, 2005.

Mr. Wayne Yakich Page Two

- Continue the removal of any asbestos containing material, debris, or any other hazardous
 materials discovered off-site. Work practices for cleanup should be in accordance with the
 department's Air Pollution Control Program or the City of St. Louis' requirements. A status
 update of the off-site cleanup and the plan to complete this task must be provided to the
 department for approval by no later than 1700 hours, July 6, 2005.
- Continue cleanup efforts at the site to prevent any further releases of gasses, asbestos materials, or any other hazardous materials. This includes the proper disposal of fire run-off water.
- Continue air monitoring to determine any on-site and off-site impact of asbestos material to the environment and/or public health during the duration of the cleanup.

Failure on your behalf to take appropriate corrective action and continue efforts to prevent any adverse impact to the public health and environmental may result in the department taking necessary actions to abate this emergency.

The department is aware that you have contracted the services of an environmental contractor to assist your company with monitoring, sampling, and conducting a cleanup. The department appreciates your response and cooperation in this matter. The department may continue to conduct off-site air monitoring and sampling to determine any off-site impact from the released asbestos material or any other hazardous material. Please be aware the department may require additional actions from your company pending any further information obtained during the monitoring, sampling, and cleanup activities conducted at the site.

Be advised that Chapter 260.500 - 260.550, RSMo, requires the department to pursue cost recovery for the department's oversight and assistance during this emergency. In the future, you may receive a cost reimbursement request from the department.

Please mail the requested information to the Missouri Department of Natural Resources, c/o Alan Reinkemeyer. P.O. Box 176, Jefferson City, MO 65102.

Mr. Wayne Yakich Page Three

If you have any questions or concerns associated with this letter, please contact John Whitaker, EER On-Scene Coordinator, at 636-938-7810, or Alan Reinkemeyer, EER Section Chief at 573-526-3384. Thank you.

Sincerely,

ENVIRONMENTAL SERVICES PROGRAM

l Palisto

Earl Pabst Director

EP:llk

c: Doyle Childers, MDNR Director

Mohamad Alhalabi, MDNR St. Louis Regional Office Gale Carson, Missouri Department of Health and Senior Services Leanne Tippett-Mosby, MDNR Air Pollution Control Program John Whitaker, MDNR Route 66 EER

Sam Simon, City of St. Louis

APPENDIX D PRE-CERCLIS SCREENING FORM

(Eight Pages)

I. SITE NAME AND LOCATION:

NAME: Praxair, Inc., Fire Response

ADDRESS OR OTHER LOCATION IDENTIFIER: 2210 Chouteau Avenue

CITY: St. Louis

STATE: MO

ZIP: 63103

DIRECTIONS TO SITE: From Interstate 44 (I-44), exit onto Jefferson Avenue and go north to Chouteau Avenue. Go east on Chouteau Avenue two blocks, and the site is on the right side of the street.

MAP ATTACHED: Yes (see Appendix A, Figure 1 to Emergency Response report)

II. PROGRAM CONTACTS:

REQUESTED BY: Jim Silver

DATE OF REQUEST: June 24, 2005

AGENCY/OFFICE: Environmental Protection Agency/Region 7 Superfund Division

MAILING ADDRESS: 901 North 5th Street

CITY: Kansas City

STATE: Kansas

ZIP: 66101

TELEPHONE: (913) 551-7000, (636) 587-5895

FAX: (913) 551-7948

EVALUATOR: Joe Parish

AGENCY/OFFICE: Tetra Tech EM Inc.

MAILING ADDRESS: 11116 South Towne Square

CITY: St. Louis

STATE: Missouri

nd day

ZIP: 63123

TELEPHONE: (314) 892-6322 ext 23

FAX: (314) 892-6132

III. SITE INFORMATION:

TYPE OF FACILITY: Industrial compressed gas storage and

distribution facility

TYPE OF OWNERSHIP: Corporation

OWNER/OPERATOR INFORMATION: Praxair Distribution, Inc. (see page 5)

SITE STATUS (active/inactive): Active

YEARS OF OPERATION: Unknown

OPERATIONAL HISTORY: (How was the site identified?)

On June 24, 2005, EPA and the Tetra Tech Superfund Technical Assessment and Response Team (START) responded to a three-alarm fire at the Praxair, Inc., facility in St. Louis, Missouri. Praxair is a large supplier of atmospheric, process, and specialty gases, and highperformance coatings. The fire reportedly started at 1500 hours on June 24, 2005, although the cause of the fire was unknown. The fire reportedly started in an area where compressed gases, including acetylene, propane, and propylene, were stored. Toxic gases such as chlorine, ammonia, and possibly cyanide were also stored at the facility, but they were reportedly not involved in the fire. Some of the compressed cylinders were lined with asbestos-containing materials, which were released to the environment during the incident.

V. PRE-CERCLIS SCREENING ASSESSMENT CHECKLIST/DECISIONS (Criteria from "Improving Site Assessment: Pre-CERCLIS Screening Assessments," OSWER Directive #9375.2-11FS EPA-540-F-98-039, PB98-963310, October 1999)	S,					
1. Does the site already appear in CERCLIS? (If YES, this form may be inappropriate to document site decisions, i.e., a CERCLA PA (at a minimum) is required.)	YES_ or NO X					
	lings or YES_ or NO <u>X</u>					
(If YES, then explain in Section V.)						
3. Does the site consist of a release of a naturally occurring substance in its unaltered form, or solely through na occurring processes or phenomena, from a location where it is naturally found? (If YES, then explain in Section V).	naturally YES or NO <u>X</u>					
4. Is the release into a public or private drinking water supply due to deterioration of the system through ordin (If YES, then explain in Section V.)	nary use? YES or NO_X					
5. Is some other program actively involved with the site (i.e., another Federal, State, or Tribal program? (If YES, then explain in Section V.)	YES <u>X</u> or NO					
6. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (i.e., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)? (If YES, then explain in Section V).	YES or NO_X					
(i) Las, were explained to be a second of the second of th						
7. Are the hazardous substances potentially released at the site excluded by policy considerations (e.g., deferral to RCRA Corrective Action)? (If YES, then explain in Section V).	TES or NO_X					
Check one, either 8.a or 8.b, whichever applies						
8. a. Is there sufficient documentation that clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, EPA approved risk assessment completed)? YES or NO						
(Explain in Section V).						
8. b. Base on limited sampling that has been performed at/near the site in conjunction with Pre-CERCLIS Screen Assessment, is there a potential for a release that could cause adverse environmental or human health	ening					
	ES X or NO					
Yes -> Explain in the following Sections whether or not a CERCLA response action (CERCLIS entry) is warranted. No -> No CERCLIS entry is warranted. Explain in the following Sections.						

V. SUPERFUND SITE SCREENING CRITERIA A. REMEDIAL CRITERIA 1. SOURCE AND WASTE CHARACTERISTICS KNOWN OR SUSPECTED SOURCE TYPES AND LOCATIONS: There was a release of asbestos-containing materials to nearby residential properties, industrial facilities, streets, and parking lots. SIZE OF SOURCES AND QUANTITIES (Volume, Area): Unknown WASTE TYPES OR HAZARDOUS SUBSTANCES KNOWN OR SUSPECTED TO BE PRESENT: Asbestos 2. GROUND WATER PATHWAY: What is the likelihood that a release to groundwater has occurred at the site? No release to groundwater is suspected to have occurred as result of this incident. If a release is not suspected proceed to A.3. a. USE AND CHARACTERISTICS: GENERAL STRATIGRAPHY AND HYDROLOGY: PRESENCE OF KARST TERRAIN: DEPTH TO SHALLOWEST AQUIFER: PRIVATE WELLS WITHIN 4 MILES (locations and population served): MUNICIPAL WELLS WITHIN 4 MILES (locations and population served): DISTANCE TO NEAREST DRINKING WATER WELL: WELLHEAD PROTECTION AREAS: 3. SURFACE WATER PATHWAY: What is the likelihood that a release to surface water has occurred at the site? No release to surface water is suspected to have occurred as a result of this incident. If a release is not suspected proceed to A.4. a. USE AND CHARACTERISTICS: FLOOD FREQUENCY: DISTANCE TO NEAREST SURFACE WATER: SURFACE WATER BODIES WITHIN 15 DOWNSTREAM MILES: DESIGNATED AND/OR PROTECTED USES OF SURFACE WATER BODIES: DRINKING WATER INTAKES WITHIN 15 DOWNSTREAM MILES (locations and populations served): FISHERIES WITHIN 15 DOWNSTREAM MILES:

KNOWN OR POTENTIAL SENSITIVE ENVIRONMENTS AND WETLANDS WITHIN 15 DOWNSTREAM MILES:

4. SOIL EXPOSURE PATHWAY:

What is the likelihood of exposure to hazardous substances at the site? Asbestos-containing materials are suspected to have been released to surface soils near the site.

a. CHARACTERISTICS:

NUMBER OF PEOPLE LIVING WITHIN 200 FEET: Approximately 400

SCHOOLS OR DAY-CARES WITHIN 200 FEET: Unknown

POPULATIONS WITHIN 1 MILE: Approximately 6,000

NUMBER OF WORKERS AT THE FACILITY OR ADJACENT FACILITIES WHOSE CONTAMINATION IS SUSPECTED: Approximately 70

LOCATIONS OF KNOWN OR POTENTIAL TERRESTRIAL SENSITIVE ENVIRONMENTS: Unknown

5. AIR PATHWAY:

What is the likelihood that a release of hazardous substances are migrating from the site to the air? Air samples collected following the incident indicated no airborne levels of asbestos above concentrations of concern.

If a release is not suspected proceed to B.

a. CHARACTERISTICS

POPULATIONS WITHIN 4 MILES

DISTANCE TO NEAREST INDIVIDUAL:

LOCATIONS OF KNOWN OR POTENTIAL SENSITIVE ENVIRONMENTS WITHIN 0 TO 1/4 MILE AND 1/4 TO ½ MILE:

B. REMOVAL CRITERIA

IS THERE A RELEASE AS DEFINED BY THE NCP?

YES X or NO _

EXPLAIN: A release of asbestos-containing materials to the environment occurred as a result of the fire at this facility.

(A RELEASE is defined as any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment of barrels, containers, and other closed receptacles containing any hazardous substances or pollutant or contaminant), but excludes: workplace exposures; engine exhaust emissions; nuclear releases otherwise regulated; and the normal application of fertilizer. For purposes of the NCP, release also means threat of release.[40 CFR 300.410(e)])

A ...

B. REMOVAL CRITERIA (continued):

IS THE SOURCE A FACILITY OR VESSEL AS DEFINED BY THE NCP?

YES_X or NO _

EXPLAIN: The area where the asbestos-containing material was deposited is considered a facility as defined by the NCP.

(A FACILITY is defined as any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or POTW), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft or any site or area, where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel. A VESSEL is defined as any description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water other than a public vessel. [40 CFR 300.410(e)]

DOES THE RELEASE INVOLVE A HAZARDOUS SUBSTANCE, POLLUTANT OR CONTAMINANT AS DEFINED BY THE NCP?

YESX or NO_

EXPLAIN: Asbestos is classified as a hazardous substance.

(A HAZARDOUS SUBSTANCE means any substance, element, compound, mixture, solution, hazardous waste, toxic pollutant, hazardous air pollutant, or imminently hazardous chemical substance or mixture designated pursuant to the CWA, CERCLA, SDWA, CAA or TSCA. The term does not include petroleum products, natural gas, natural gas liquids, liquefied natural gas, synthetic gas or mixtures of natural and synthetic gas. The definition of POLLUTANT or CONTAMINANT includes, but is not limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions or physical deformations, in such organisms or their offspring. The term does not include petroleum products, natural gas, natural gas liquids, liquefied natural gas, synthetic gas or mixtures of natural and synthetic gas.).[40 CFR 300.410(e)]

IS THE RELEASE SUBJECT TO THE LIMITATIONS ON RESPONSE?

YES or NO X

EXPLAIN: The release is not subject to limitations on response.

(The LIMITATIONS ON RESPONSE provisions of the NCP (40 CFR 300.400(B) states that removals shall not be undertaken in response to a release: of a naturally occurring substance in its unaltered or natural form; from products that are a part of the structure of, and result in exposure within, residential buildings or business or community structures; or into public or private drinking water supplies due to deterioration of the system through ordinary use.).[40 CFR 300.410(e)]

DOES THE QUANTITY OR CONCENTRATION WARRANT RESPONSE?

YES X or NO

EXPLAIN: Concentrations of chrysotile asbestos up to 25% were detected in bulk samples collected from debris originating from the site.

[40 CFR 300.410(e)]

HAS A PRP BEEN IDENTIFIED? (Include name, address and telephone number)

YES X or NO

EXPLAIN: Praxair Distribution, Inc., has assumed liability for the incident and is coordinating environmental cleanup activities in conjunction with the Missouri Department of Natural Resources (MDNR).

Praxair Distribution Inc. 39 Old Ridgebury Road Danbury, CT 06810-5113 1-800-PRAXAIR

[40 CFR 300.410(e)]

B. REMOVAL CRITERIA (continued):						
IS THERE AN ACTUAL OR POTENTIAL EXPOSURE TO HAZARDOUS SUBSTANCES OR POLLUTANTS, OR CONTAMINANTS? YES X or NO						
EXPLAIN: There was a release of asbestos-containing materials to the area surrounding the Praxair facility.						
IS THERE ACTUAL OR A POTENTIAL FOR CONTAMINATION OF DRINKING WATER SUPPLIES? YES_ or NO_X						
EXPLAIN: No threat to drinking water supplies is suspected.						
ARE THERE HAZARDOUS SUBSTANCES, POLLUTANTS, OR CONTAMINANTS IN DRUMS, BARRELS, OR BULK STORAGE CONTAINERS? YES X or NO_						
EXPLAIN: Although compressed gases were stored in cylinders at this site where the fire occurred, those materials do not appear to present a current threat to human health or the environment.						
ARE THERE HIGH LEVELS OF HAZARDOUS SUBSTANCES, POLLUTANTS, OR CONTAMINANTS IN NEAR-SURFACE SOILS? YES X or NO_						
EXPLAIN: Asbestos-containing materials are suspected to have been released to surface soils near the site.						
("High levels" may be determined by streamlined risk assessments, health consultations, state or federal soil screening criteria, and/or Superfund program policies or directives.)						
ARE THERE CONDITIONS ON SITE WHICH MAY BE SUSCEPTIBLE TO IMPACT FROM ADVERSE WEATHER CONDITIONS? YES X or NO						
EXPLAIN: Heavy rainfall could promote runoff contaminated with asbestos-containing materials.						
IS THERE A THREAT OF FIRE OR EXPLOSION? YES X or NO _						
EXPLAIN: If flammable materials remain on site, a potential for another fire exists.						
IS THERE A POTENTIAL FOR OTHER FEDERAL OR STATE RESPONSE MECHANISMS? YES \underline{X} or NO _ IF SO, IDENTIFY THE APPROPRIATE PROGRAM:						
RCRANRCFIFRAUSTOTHER FEDERAL _X_STATE DEFERRAL						
EXPLAIN: MDNR is monitoring cleanup activities coordinated by Praxair.						
ARE THERE OTHER SITUATIONS OR FACTORS WHICH WARRANT FURTHER YES_or NO X SUPERFUND RESPONSE?						
EXPLAIN:						

VI. SUPERFUND SITE SCREENING FINDINGS AND RECOMMENDATIONS:

X NO FURTHER SUPERFUND RESPONSE ACTION REQUIRED - SUPERFUND CERCLIS ENTRY NOT WARRANTED

(Cite the appropriate criteria from SECTION V as the basis for the above determination.)

Yes	No	Unknown	Issue	Yes	No	Unknown	Issue
	X		Ground Water Pathway Threat	X			Direct Exposure Pathway Threat
	X		Surface Water Pathway Threat		Х		Air Pathway Threat
X			Release or Threat of Release	X			A Facility or Vessel
x			Hazardous Substance, Pollutant, or Contaminant		х		Subject To Response Limitations
x			Contaminants present in Significant Quantity and/or Concentration	Х			Exposure To Hazardous Substances or Pollutants or Contaminants
X			Drums, Barrels or Bulk Containers Present	х			High Levels of Contaminants In Surface Soils
X			Site Susceptible To Adverse Weather Conditions	х		4	Threat of Fire or Explosion
X			Willing/Capable PRP Response	X			Referred To Another Program

COMMENT: Because all environmental concerns related to this incident will likely be addressed by cleanup activities coordinated by the potentially responsible party (PRP), under the direction of MDNR, no further Superfund response appears to be warranted.

REMOVAL ACTION RECOMMENDED:

EMERGENCY

TIME-CRITICAL

NON-TIME-CRITICAL

(Cite one or more of the conditions or factors from Section V. REMOVAL CRITERIA, as a basis for recommending that a removal action be conducted.)

Yes	No	Unknown	Issue	Yes	No	Unknown	Issue
			Exposure To Hazardous Substances or Pollutants or Contaminants				Actual or A Potential For Contamination of Drinking Water Supplies
			Drums, Barrels or Bulk Containers Present				High Levels of Contaminants Near- Surface Soils
			Site Susceptible To Adverse Weather Conditions				Fire/Explosion Threat
			Other Response Mechanism				Other Factors

COMMENT:

(Complete Recommended Removal Action Attachment and the Site Prioritization Information Summary Attachment for sites recommended for a Removal Action.)

VI. SU	VI. SUPERFUND SITE SCREENING RECOMMENDATIONS (continued):							
	ADDITIONAL INTEGRATED ASSESSMENT RECOMMENDED							
(Cite the appropriate criteria from Section V as a basis for recommending that additional site evaluation be performed.)								
Yes	No	Unknown	Issue	Yes	No	Unknown	Issue	
			Ground Water Pathway Threat				Direct Exposure Pathway Threat	
			Surface Water Pathway Threat				Air Pathway Threat	
		5.	Release or Threat of Release				A Facility or Vessel	
			Hazardous Substance, Pollutant, or Contaminant				Subject To Response Limitations	
***			Contaminants present in Significant Quantity and/or Concentration				Exposure To Hazardous Substances or Pollutants or Contaminants	
			Drums, Barrels or Bulk Containers Present				High Levels of Contaminants In Surface Soils	
			Site Susceptible To Adverse Weather Conditions				Threat of Fire or Explosion	
			Willing/Capable PRP Response				Referred To Another Program	
COMMENT:								
VII. ADDITIONAL INFORMATION OR COMMENTS								
(NOTE: Complete Site Prioritization Information Summary Attachment for sites recommended for further Integrated Assessment work.)								
EPA USE ONLY								
VIII. DETERMINATION								
SIGNATURE: DATE:								